IN THE UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

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§	Cause No. 3:12-cv-00094-D-BK
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PLAINTIFF'S FIRST AMENDED MOTION FOR ISSUANCE OF WRIT OF GARNISHMENT AFTER JUDGMENT

Plaintiff, by and through undersigned Counsel, pursuant to Tex. Civ. Prac. & Rem. Code § 63.001, moves for the issuance of a writ of garnishment after judgment as to Garnishee JPMorgan Chase Bank, National Association ("Chase") and as grounds therefore, states as follows:

- 1. Plaintiff Pedro Garcia Arriaga obtained a final judgment in favor of Plaintiff and against Jess Enterprises, LLC, SEJ Properties, L.P., Califco, LLC, and Elias Shokrian a/k/a Elias Shakrian, jointly and severally, in the amount of \$29,000.62 [D.E. 48, para. 2].
- 2. Plaintiff's Counsel obtained a judgment against Jess Enterprises, LLC, SEJ Properties, L.P., Califco, LLC, and Elias Shokrian a/k/a Elias Shakrian, jointly and severally, in the amount of \$89,381.80 as attorney's fees [D.E. 52, pg. 5]. and costs [D.E. 58].
- 3. The combined amount of the judgment is for \$118,382.42. A true and correct copy of the Judgment is attached hereto as **Exhibit A**. A true and correct copy of the Memorandum

Opinion and Order for attorneys' fee is attached hereto as Exhibit B. A true and correct

copy of the Taxation of Costs is attached hereto as **Exhibit C**.

4. Plaintiff, through undersigned counsel, requests that a writ of garnishment after judgment

as to Chase be issued in the amount of \$118,382.42.

5. The judgment is in all things final, valid and subsisting, and it is wholly unsatisfied and

unpaid.

6. Within Plaintiff's knowledge, Defendants Jess Enterprises, LLC, SEJ Properties, L.P.,

Califco, LLC, and Elias Shokrian a/k/a Elias Shakrian, do not possess property in Texas

subject to execution sufficient to satisfy the judgment. This Motion is supported by the

Affidavit of Pedro Garcia Arriaga attached hereto as **Exhibit D**.

7. Plaintiff has reason to believe that Garnishee Chase is indebted to, or possess non-exempt

property belonging to, Defendants Jess Enterprises, LLC, SEJ Properties, L.P., Califco,

LLC, and Elias Shokrian a/k/a Elias Shakrian, jointly and severally.

Request for Relief

Wherefore, Plaintiff requests that the writ of garnishment be issued as to Garnishee

Chase.

Respectfully submitted,

By: /s/ Niki W. Zhou

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